

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: "MB Docket No. 10-71, Petition for Rulemaking to Amend the Commission's Rules Governing Retransmission Consent"

Dear Chairman Genachowski:

The National Puerto Rican Chamber of Commerce supports the development of entrepreneurship and innovation for Hispanics and other minorities throughout Puerto Rico and the U.S. mainland. We provide a comprehensive resource for incubating and growing business ideas as well as representing the interests of those businesses. In addition to the small business owner, we realize that the consumer drives the market. Therefore, we must ensure that small businesses and their customers are protected.

For this reason we are urging the Commission to update the existing retransmission consent rules. Not only do the current rules place consumers at risk of losing invaluable resources for news and information, as well as the potential for higher cable rates, but small business owners can lose one of their most valuable and reliable tools for advertising. Consumer spending is historically low and with a decrease in advertising channels, even a short pause in marketing opportunities for small businesses could place the businesses, as well as its employees, at serious risk.

From our work with Hispanics and other minorities, and understanding their frustration with the continuing threat of blackouts, we know how important it is to understand the dynamics behind minority populations and their relations to television. Television for Hispanics has gone through many changes. For example, according to the National Association of Broadcasters, between 2000 and 2010 the number of Spanish-language stations increased over 57 percent and more than 25 percent of Hispanic television households currently rely solely on over-the-air broadcasting. Businesses that cater to Hispanic customers also rely heavily on those stations.

Short-term negotiations have not provided a reliable answer. Consumers and small businesses need long-term protections, and this can only come about if the existing retransmission consent rules are thoroughly examined and restructured. Although generally at odds with increased government intervention in free market business practices, our concerns with potentially monopolistic practices and the potential impact on Hispanics and their small businesses have driven us to respectfully request the Commission to issue a Notice of Proposed Rulemaking to permanently reform the retransmission consent rules.

Sincerely,



Justin Velez-Hagan